

MEMO ENDORSED

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Rachel Perillo

June 1, 2020

By ECF & Email

Honorable Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Jalyn Oliver
18 Cr. 698 (ALC)

Dear Judge Carter:

I am the attorney for Jalyn Oliver, the defendant in the above-referenced case. This letter is respectfully submitted, with the consent of Pretrial Services, to request a modification of Mr. Oliver's bond conditions to remove the conditions of home detention and electronic monitoring. I previously notified the government of our intention to make this application and have not yet received notice of its position.

In August 2018, Mr. Oliver was released on a \$50,000 personal recognizance bond, subject to conditions of release. On November 20, 2019 the Court held a bail revocation hearing during which it addressed Mr. Oliver's violations of conditions of release as set forth in a memorandum filed by Pretrial Services. At that time, Mr. Oliver was subject to the conditions of electronic monitoring and a strict curfew. The Court ultimately decided not to remand Mr. Oliver but ordered that the condition of electronic monitoring continue and that Mr. Oliver be placed on home detention. Mr. Oliver is scheduled to be sentenced on July 14, 2020; however, due to COVID-19 and related court closures, it is expected that sentencing may ultimately be postponed for a few months.

Since the detention hearing held in November 2019, Mr. Oliver has remained compliant with all of his conditions of release. I have conferred with his Pretrial Services Officer, Joshua Rothman, who indicates that Mr. Oliver has exhibited a lot of progress since the detention

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hearing, and has been doing everything that is required of him, including maintaining employment at Sport Time on Randall's Island (although Sport Time is currently closed due to the ongoing COVID-19 pandemic, Mr. Oliver expects to return to his job once the facility reopens). For these reasons, Officer Rothman consents to the removal of home detention and electronic monitoring.

Mr. Oliver's continued compliance over the last six-and-a-half months demonstrates that he is taking the Court's previous reprimanding seriously, and it is clear that he is doing everything that he can to put his criminal activity behind him and live a positive, law-abiding life going forward. Accordingly, it is respectfully requested that the Court remove the conditions of home detention and electronic monitoring while Mr. Oliver awaits sentencing in this matter.

The Court's time and attention to this matter is appreciated.

Respectfully submitted,

/s/

Jeremy Schneider

cc: AUSA Karin Portlock (by ECF & Email)
AUSA Frank Balsamello (by ECF & Email)
USPO Joshua Rothman (by Email)

The application is DENIED.
So Ordered.


6/4/20